

**PART I**

- A. The permittee is authorized to operate Class V Injection Wells, at the facility described in the permit application and in the cover page of this permit, in accordance with the provisions set forth in this permit.
- B. This permit and the authorization to inject shall remain in effect until the expiration date stated on the cover page of this permit. If the permittee desires to continue injection past the expiration date of this permit, the permittee shall request a permit reissuance at least 180 days prior to expiration of this permit.

**PART II Construction Requirements**

- A. Injection Well Requirements
  - 1. The permittee may inject the hydrogen peroxide solution, ferrous sulfate solution, microbes and nutrients, and treated extracted groundwater as described in the permit application.
  - 2. The permittee shall provide a means of sampling the injection fluids prior to injection.
- B. Modifications

Approval of the Alabama Department of Environmental Management (ADEM) shall be obtained prior to modification of any injection well or supporting surface. Modification shall mean any action that will change the configuration of the well beneath the surface, the methods of monitoring injection, or will result in injection of a fluid not specifically authorized by this permit.

**PART III Monitoring and Operating Requirements**

- A. Injection Fluids
  - 1. Prior to injection of extracted groundwater, the permit shall treat the groundwater by passing through a wastewater treatment system. The treatment system shall be adequate to meet the discharge limitations contained in Appendix A. Prior to injection, the permittee shall monitor the treated groundwater as specified in Appendix A of this permit. Groundwater which does not meet the discharge limitations contained in Appendix A shall not be injected.
  - 2. The permittee shall not inject any substance that is defined as hazardous or toxic by Federal or State laws or regulations or any substance not identified in the applications for this permit.

B. Monitoring Wells

1. The permittee shall monitor and limit groundwater in accordance with Appendix B. The injection activity shall not result in the exceedence of any established MCL in groundwater outside the areas of contamination.
2. The groundwater monitoring regime must be sufficient to detect any adverse affects to groundwater quality due to the injection activity. The Department may change the sampling requirements if the sampling data indicate a need to do so.
3. Monitoring wells shall be sampled for background water quality prior to injection.

C. Operation

The injection wells operated under this permit shall function properly and the injection fluids shall not surface. Should the injection wells fail to function properly, the permittee shall take corrective action, to include cessation of injection, as required by ADEM.

**PART IV Records, Reports, & Submittals**

A. Records

1. The permittee shall retain all records concerning the data used to complete the permit modification application, the operation of the wells, and the nature and composition of substances injected; to include records of the calibration of instruments, meters and gauges, quality control records, and recordings from continuous monitoring instrumentation; until at least three years after the closure of wells.
2. When requested by ADEM, the permittee shall deliver any of the records maintained in accordance with this permit.

B. Reports

1. The permittee shall submit on a quarterly basis, written confirmation of all injection of permitted substances. The confirmations shall include the information listed below:
  - a) The dates of the injection.
  - b) The amount of each substance injected.
  - c) The location(s) of the injection.
2. The permittee shall submit not later than 28 days after monitoring performed under Appendix A, a monitoring report which shall include:
  - a) The date, exact place, and time of sampling or sampling measurement(s);
  - b) The complete chain of custody forms for all samples collected and
  - c) The results of each analysis performed.

3. The permittee shall submit to ADEM ground water monitoring reports on a quarterly basis. The reports shall include as a minimum:
  - a) The date, and exact place of sampling;
  - b) The complete chain of custody forms for all samples collected and
  - c) The results of each analysis performed.
4. The permittee shall report to ADEM any of the following:
  - a) Any planned action which will change the use of the injection wells, will result in injection of a fluid different from that authorized by this permit, will change the method of operations of any injection well, or will change the method of the monitoring of well operations or injected fluids.
  - b) Any planned transfer of ownership of all or part of the permitted facility.
  - c) Any relevant facts of which the permittee becomes aware which should have been submitted in a permit modification application and any corrections to data previously submitted in a permit application.
5. Other Submittals

Studies, engineering reports, plans and specifications, plugging and abandonment plans, logging reports, and other technical documents submitted to comply with this permit shall be prepared by or under the supervision of qualified persons defined by Rule 6-8-.13 of the UIC Regulations of the ADEM.

## **PART V Plugging and Abandonment**

The permittee shall perform any abandonment and closure actions that may be required by ADEM to remove a threat to groundwater quality or to the health of persons which is caused by the injection activity.

## **PART VI Permit Modification, Revocation, Suspension, and Termination**

- A. ADEM may impose emergency additional conditions to this permit when necessary to protect waters of the state from pollution. These conditions may include suspension of the permit to inject and shall remain in effect until the permit is modified, revoked, suspended or terminated in accordance with 6-8-.12(a)3-5 and 6-8-.12(f) of the UIC Regulations of the ADEM.
- B. Non-emergency permit modification, revocation, suspension, and termination actions shall be accomplished in accordance with ADEM Administrative Code Rule 335-6-8.

## **PART VII     General Provisions**

### **A.     Test Procedures**

Test procedures for the analysis of pollutants shall conform to 40 CFR Part 136 of the Federal Register and guidelines published pursuant to Section 304(h) of the Federal Water Pollution Control Act (FWPCA). If more than one method of analysis of a substance is approved for use, a method having a detection limit lower than the permit limit shall be used. If the detection limit of all methods is higher than the permit limit, the method having the lowest detection limit shall be used and a report of less than detection limit shall constitute compliance. However, should the Environmental Protection Agency (EPA) approve a method with a lower detection limit during the term of this permit the permittee shall use the newly approved method.

### **B.     The permittee shall comply with all provisions of the UIC Regulations of the ADEM and shall comply with all provisions of this permit and shall reduce or halt injection if needed to maintain compliance with the permit and regulations.**

### **C.     The permittee shall comply with all applicable Federal and State hazardous waste management regulations.**

### **D.     The permittee shall allow members of the ADEM staff to:**

1.     access property and records of the permittee for purposes of inspection.
2.     collect samples of the injected fluids, process and wastewater streams associated with the permitted injection wells.
3.     collect samples from any monitoring wells.
4.     obtain copies of records upon request.

### **E.     The permittee shall immediately take all reasonable steps to minimize or correct any adverse environmental impact resulting from the operation of the permitted injection wells.**

### **F.     This permit does not convey any property rights of any sort, or any exclusive privilege.**

### **G.     The filing of a request by the permittee for a permit modification, revocation, and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.**

### **H.     Any noncompliance with this permit constitutes a violation of the Alabama Water Pollution Control Act and/or the Underground Injection Control Regulations and is grounds for enforcement action such as permit termination, revocation, modification; or denial of a permit renewal application.**

### **I.     All provisions of ADEM Admin. Code Rule 335-6-8-.12 are incorporated as terms and conditions of this permit by reference.**

## APPENDIX A

Prior to injection, extracted groundwater shall be limited and monitored by the permittee as specified below:

<u>EFFLUENT CHARACTERISTIC</u>	<u>UNITS</u>	<u>DISCHARGE LIMITS</u>	<u>FREQUENCY</u>	<u>SAMPLE TYPE</u>
Benzene	mg/l	0.005	Batch	Grab
Toluene	mg/l	1	Batch	Grab
Ethyl Benzene	mg/l	0.7	Batch	Grab
Xylenes	mg/l	10	Batch	Grab
Benzo(a)pyrene	mg/l	0.0002	Batch	Grab
MtBE	mg/l	Monitor	Batch	Grab

## APPENDIX B

Groundwater monitoring well MW-13 shall be sampled prior to startup and then quarterly as specified below.  
The monitoring well shall be limited by the permittee as specified below:

<u>EFFLUENT CHARACTERISTIC</u>	<u>UNITS</u>	<u>LIMITS</u>	<u>MONITORING REQUIREMENTS</u>	
			<u>FREQUENCY</u>	<u>SAMPLE TYPE</u>
pH	standard units	6.5-8.5	quarterly	Grab
Nitrate	mg/L	10	quarterly	Grab
Iron*	mg/L	0.3	quarterly	Grab
Sulfate	mg/L	250	quarterly	Grab

\*Due to the fact that Iron can sometimes be naturally found in levels that exceed drinking water standards and since iron is not normally a severe health risk, the permit will allow the discharge to continue as long as the discharge does not cause a significant rise in levels above background concentrations

## ADEM Permit Rationale

Date: December 21, 2011

Prepared by: Joe Kelly

Permit Applicant Name: Saleem Punjani

Facility Name: Eufaula Tackle Box

Location: 2551 Highway 431 North  
Eufaula  
Barbour County, Alabama  
Lat: N 32.007489/W -85.115894  
Town 12N, Range 29 E, Section 22

UIC Permit Number ALSI9903002

Draft Permit is: Initial Registration / New Use

Injection Description: injection of amendments to aid in the remediation of existing petroleum contamination

Discussion: Standard permit drafted.

1. No hazardous injection
2. Treatment limits for injected groundwater
3. Groundwater sampling required